

ORIGINAL

DOCKET FILE COPY ORIGINAL



RINI,  
CORAN &  
LANCELLOTTA,  
P.C.

*Attorneys at Law*

1350 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036-1701  
Tel: (202) 296-2007  
Fax: (202) 429-0551  
www.rclpc.com

January 16, 2001

**RECEIVED**

**JAN 16 2001**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

**VIA HAND DELIVERY**

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Amendment of Section 73.622(b),  
Table of Allotments,  
Digital Television Broadcast Stations,  
(La Crosse, Wisconsin)  
**MM Docket No. 00-236; RM - 10000**

Dear Ms. Salas:

Transmitted herewith on behalf of QueenB Television, LLC, the licensee of NTSC Station WKBT-TV (Channel 8), La Crosse Wisconsin, and petitioner in the above-referenced proceeding, are an original and four copies of its comments supporting the substitution of DTV Channel 41 for the assigned DTV Channel 53 for WKBT-DT, pursuant to the Commission's Notice of Proposed Rule Making released on November 24, 2000.

Please contact the undersigned if there are any questions concerning this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Rini', is written over a circular stamp that contains the letters 'FCC'.

Robert J. Rini  
Counsel to QueenB Television, LLC

Enclosures

No. of Copies rec'd 14  
List A B C D E

**JAN 16 2001**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 00-236  
RM-10000

## **COMMENTS IN SUPPORT OF PROPOSED RULE MAKING**

As discussed in WKBT's Petition to Modify DTV Channel Allotment dated June 19, 2000 (the "Petition"), which is hereby incorporated by reference, WKBT's present DTV transitional allotment, Channel 53, is not within the core group of television channels that will be retained for broadcast use following the end of the DTV transition. Should WKBT be required to operate on Channel 53 during the DTV transition, at the end of the transition, the station would be required to shift its DTV operations to Channel 8, its present analog channel, or to seek allotment of a totally new channel within the core group. A shift to a totally new channel after the transition would require that WKBT purchase new transmission equipment and would mean that WKBT-DT would lose the channel number identification it would have created during its years of transitional DTV broadcasting on Channel 53. The desirability of Channel 8, WKBT's

present analog channel, for permanent DTV broadcasting is at this time uncertain owing to what may prove to be greater susceptibility of DTV reception to electrical noise on the high band VHF channels.

Accordingly, WKBT strongly supports the Commission's proposal to amend the DTV Table of Allotments to substitute Channel 41 for Channel 53 as its transitional channel. As stated in the Notice and demonstrated in the Petition, the proposed channel substitution would be consistent with the requirements of Section 73.623 of the FCC's Rules in that (1) the principal city coverage requirements of Section 73.625(a) of the Rules would be met and (2) no NTSC or DTV station would receive interference from a WKBT-DT Channel 41 operation in excess of the *de minimis* standard established in Section 73.623(c)(2) of the Rules.

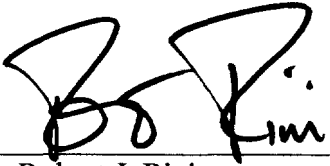
WKBT has conditioned its channel substitution request on its being authorized to broadcast on proposed DTV Channel 41 with a maximum ERP of 1000 kW, the same maximum ERP as is presently authorized for WKBT-DT's use of Channel 53. WKBT therefore strongly supports the the Commission's proposal to substitute Channel 41 with a specified DTV power of 1000 kW. Operation with 1000 kW ERP on Channel 41 will produce virtually the same degree of replication of WKBT-DT's present analog service area as would operation with 1000 kW ERP on Channel 53. As demonstrated in the Petition, operation of WKBT-DT on Channel 41 at 1000 kW would not preclude any other station from achieving a power level of at least 200 kW.

WKBT hereby affirms its present intention to apply for DTV Channel 41 at La Crosse, Wisconsin if it is allotted and, if authorized, to build its DTV facility promptly within the required time frame.

For the reasons set forth above, WKBT strongly supports the Commission's proposal to amend the DTV Table of Allotments to allot and assign DTV Channel 41 (in substitution for Channel 53) to La Crosse, Wisconsin, for use by WKBT-DT, with no change in the specification of 1000 kW as the maximum effective radiated power for WKBT-DT.

Respectfully submitted,

QueenB Television, LLC

By: 

Robert J. Rini  
Rini, Coran & Lancellotta, P.C.  
1350 Connecticut Avenue, N.W.  
Suite 900  
Washington, D.C. 20036

January 16, 2001

## **CERTIFICATE OF SERVICE**

I, Yvette Graves, a legal secretary with the law firm of Rini, Coran & Lancellotta, P.C., certify that on this 16th day of January, 2001, I caused copies of the foregoing "Comments in Support of Proposed Rule Making" to be hand-delivered to the following:

Clay Pendarvis, Esq.  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Barbara Kreisman, Esq.  
Chief, Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

H. John Morgan  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Gordon Godfrey  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Pamela Blumenthal, Esq.  
Video Services Division  
Mass Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

  
Yvette Graves